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Arizona Fire Chiefs Association

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November 21,2006

The Honorable Kevin J. Martin Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re

Docket No. RM-11348 - Reallocation of 30 MHz Spectrum (747-762/777-792 MHz) From Commercial Use

Dear Chairman Martin:

The mission of the Arizona Fire Chiefs Association (AFCA) is to serve chief fire officers by providing leadership through involvement; professional development through networking, education and information distribution; and a forum to improve the fire service of Arizona. In that light, and as members of the Western Fire Chiefs Association and the International Fire Chiefs Association, we join them in expressing our concern with the ever-increasing demands on our limited resources. This concern has never been greater as we reconcile critical interoperable communications requirements with less than adequate spectrum resources.

The Arizona Statewide Mutual Aid Plan, developed by the AFCA, is one example of our commitment to improving the fire service in Arizona. In order to ensure the success of our Statewide Mutual Aid Plan we must have an effective, interoperable wireless communications system.

The nation's communications systems supporting public safety are not interoperable and much less than ideal. First responders have long known that distinct manufacturers' systems could not talk directly with each other. Even before the 9/11 attacks, our nation was aware that our communications systems were less than adequate. At every major incident where multiple groups respond, we still have to resort to runners to exchange information and communicate. We should not have to do this in the 21st century when the technology exists to do This needs to become a priority for our nation before the otherwise. next disaster strikes. We should not endure another tragedy without a

nationwide, interoperable, wireless, high-speed, broadband network supporting our public safety first responders.

The AFCA endorses development of a nationwide, wireless broadband network dedicated to public safety communications needs, which would be financed and maintained through a public/private partnership. The AFCA further supports the allocation of an additional 30 MHz of spectrum at 700 MHz to public safety, and the creation of a Public Safety Broadband Trust (PSBT).

The AFCA urges this Commission and the United States Congress to support public safety on this critical issue.

The AFCA urges swift Congressional action to ensure that this spectrum is not auctioned for solely commercial use, but in its place assigned to the Public Safety Broadband Trust to be used for primary, interoperable public safety operations. By this letter, the AFCA urges the FCC to act in the public interest and urges our Congressional Representatives to sponsor and pass legislation to create the Public Safety Broadband Trust and allocate 30 MHz of spectrum from the upper 700 MHz band to meet critical public safety communications needs as outlined within Docket No. RM-11348.

Sincerely,

Chief Mark Burdick

President

Copy to: AZ Congressional Delegation